

Adam B. Wolf (SBN 215914)  
Catherine Cabalo (SBN 248198)  
PEIFFER WOLF CARR KANE CONWAY  
& WISE, LLP  
4 Embarcadero Center, Suite 1400  
San Francisco, CA 94111  
Telephone: (415) 766-3592  
Facsimile: (415) 402-0058  
awolf@peifferwolf.com  
ccabalo@peifferwolf.com

Irakli Karbelashvili (SBN 302971)  
ALL ACCESS LAW GROUP  
1400 Coleman Ave Ste F28  
Santa Clara, CA 95050  
Telephone: (408) 295-0137  
Fax: (408) 295-0142  
irakli@allaccesslawgroup.com

Paul L. Rein (SBN 43053)  
Aaron M. Clefton (SBN 318680)  
REIN & CLEFTON, Attorneys at Law  
200 Lakeside Drive, Suite A  
Oakland, CA 94612  
Telephone: (510) 832-5001  
Facsimile: (510) 832-4787  
info@reincleftonlaw.com

Attorneys for Plaintiff  
CHRISTINE DiBELLA

*\*Defense counsel listed after caption*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CHRISTINE DiBELLA,

Plaintiff,

v.

BOARD OF TRUSTEES OF THE  
CALIFORNIA STATE UNIVERSITY;  
STEVE RELYEA, Acting Chancellor of  
California State University, in his official  
capacity; JOLENE KOESTER, incoming  
Interim Chancellor of California State  
University, in her official capacity;  
JEFFREY D. ARMSTRONG, President of  
California Polytechnic State University,  
San Luis Obispo, in his official capacity;  
ERIKA D. BECK, President of California  
State University, Northridge, in her official  
capacity; SORAYA M. COLEY, President  
of California Polytechnic State University,  
Pomona, in her official capacity; JANE  
CLOSE CONOLEY, President of  
California State University, Long Beach, in

CASE NO. 4:21-cv-08461-HSG  
Civil Rights

**STIPULATION AND ORDER MODIFYING  
BRIEFING SCHEDULE FOR  
DEFENDANTS' MOTION TO DISMISS  
(DOCKET NO. 44)**

her official capacity; WILLIAM A. COVINO, President of California State University, Los Angeles, in his official capacity; THOMAS A. CROPPER, President of California State University Maritime Academy, in his official capacity; ADELA DE LA TORRE, President of San Diego State University, in her official capacity; GAYLE E. HUTCHINSON, President of California State University, Chico, in her official capacity; TOM JACKSON, JR., President of California Polytechnic State University, Humboldt, in his official capacity; SAUL JIMÉNEZ-SANDOVAL, President of California State University, Fresno, in his official capacity; ELLEN N. JUNN, President of California State University, Stanislaus, in her official capacity; LYNN MAHONEY, President of San Francisco State University, in her official capacity; TOMÁS D. MORALES, President of California State University, San Bernardino, in his official capacity; ROBERT S. NELSEN, President of California State University, Sacramento, in his official capacity; ELLEN J. NEUFELDT, President of California State University, San Marcos, in her official capacity; EDUARDO M. OCHOA, President of California State University, Monterey Bay, in his official capacity; THOMAS A. PARHAM, President of California State University, Dominguez Hills, in his official capacity; STEPHEN PEREZ, President of San Jose State University, in his official capacity; JUDY K. SAKAKI, President of Sonoma State University, in her official capacity; CATHY A. SANDEEN, President of California State University, East Bay, in her official capacity; FRAMROZE VIRJEE, President of California State University, Fullerton, in his official capacity; RICHARD YAO, President of California State University, Channel Islands, in his official capacity; LYNNETTE ZELEZNY, President of California State University, Bakersfield, in her official capacity; COMPASS GROUP USA, INC. dba CHARTWELLS HIGHER EDUCATION,

Defendants.

ALISON K. BEANUM, State Bar No. 221968  
 alison.beanum@clydeco.us  
 DOUGLAS J. COLLODEL, State Bar No. 112797  
 douglas.collodel@clydeco.us  
 CLYDE & CO US LLP  
 355 South Grand Avenue, Suite 1400  
 Los Angeles, California 90071  
 Telephone: (213) 358 7600  
 Facsimile: (213) 358 7650

Attorneys for Defendant  
 BOARD OF TRUSTEES OF THE  
 CALIFORNIA STATE UNIVERSITY and individual defendants  
 (see complete list of individual defendants on signature page)

### **STIPULATION**

Plaintiff CHRISTINE DiBELLA (“Plaintiff”) and Defendants BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY, which is the State of California acting in its higher education capacity; STEVE RELYEA, Acting Chancellor of California State University, in his official capacity; JOLENE KOESTER, incoming Interim Chancellor of California State University, in her official capacity; and JEFFREY D. ARMSTRONG, President of California Polytechnic State University, San Luis Obispo, in his official capacity; ERIKA D. BECK, President of California State University, Northridge, in her official capacity; SORAYA M. COLEY, President of California Polytechnic State University, Pomona, in her official capacity; JANE CLOSE CONOLEY, President of California State University, Long Beach, in her official capacity; WILLIAM A. COVINO, President of California State University, Los Angeles, in his official capacity; THOMAS A. CROPPER, President of California State University Maritime Academy, in his official capacity; ADELA DE LA TORRE, President of San Diego State University, in her official capacity; GAYLE E. HUTCHINSON, President of California State University, Chico, in her official capacity; TOM JACKSON, JR., President of California Polytechnic State University, Humboldt, in his official capacity; SAÚL JIMÉNEZ SANDOVAL, President of California State University, Fresno, in his official capacity; ELLEN N. JUNN, President of California State University, Stanislaus, in her official capacity; LYNN MAHONEY, President of San Francisco State University, in her official capacity; TOMÁS D. MORALES, President of California State University, San Bernardino, in his official capacity; ROBERT S.

NELSEN, President of California State University, Sacramento, in his official capacity; ELLEN J. NEUFELDT, President of California State University, San Marcos, in her official capacity; EDUARDO M. OCHOA, President of California State University, Monterey Bay, in his official capacity; THOMAS A. PARHAM, President of California State University, Dominguez Hills, in his official capacity; STEPHEN PEREZ, President of San Jose State University, in his official capacity; JUDY K. SAKAKI, President of Sonoma State University, in her official capacity; CATHY A. SANDEEN, President of California State University, East Bay, in her official capacity; FRAMROZE VIRJEE, President of California State University, Fullerton, in his official capacity; RICHARD YAO, President of California State University, Channel Islands, in his official capacity; LYNNETTE ZELEZNY, President of California State University, Bakersfield, in her official capacity; (hereinafter collectively referred to as “the Trustees”), – Plaintiff and Trustees together the “Parties” – hereby stipulate to a modified briefing schedule for the Trustees’ pending Motion to Dismiss (Docket No. 44). This request is based on the following good cause:

1. Presently, the deadline for Plaintiff to respond to the Trustees’ Motion to Dismiss (the “Motion”) is June 14, 2022;
2. The hearing date for the Motion is not until November 17, 2022; and
3. The Parties agree to give each other additional time to address the issues in the Motion for the Court.

Pursuant to the above, the Parties jointly stipulate and request the following:

- Plaintiff will file her Opposition to the Motion by July 18, 2022; and
- Trustees will file their Reply in support of the Motion by August 15, 2022.

**IT IS SO STIPULATED.**

Date: June 3, 2022

PEIFFER WOLF CAR KANE CONWAY & WISE, LLP

/s/ Catherine Cabalo  
By CATHERINE CABALO, Esq.  
Attorneys for Plaintiff  
CHRISTINE DiBELLA

Date: June 3, 2022

CLYDE & CO US LLP

/s/ Douglas Collodel

By Douglas Collodel, Esq.

Attorney for Defendant

BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY, which is the State of California acting in its higher education capacity; STEVE RELYEA, Acting Chancellor of California State University, in his official capacity; JOLENE KOESTER, incoming Interim Chancellor of California State University, in her official capacity; and JEFFREY D. ARMSTRONG, President of California Polytechnic State University, San Luis Obispo, in his official capacity; ERIKA D. BECK, President of California State University, Northridge, in her official capacity; SORAYA M. COLEY, President of California Polytechnic State University, Pomona, in her official capacity; JANE CLOSE CONOLEY, President of California State University, Long Beach, in her official capacity; WILLIAM A. COVINO, President of California State University, Los Angeles, in his official capacity; THOMAS A. CROPPER, President of California State University Maritime Academy, in his official capacity; ADELA DE LA TORRE, President of San Diego State University, in her official capacity; GAYLE E. HUTCHINSON, President of California State University, Chico, in her official capacity; TOM JACKSON, JR., President of California Polytechnic State University, Humboldt, in his official capacity; SAUL JIMÉNEZ SANDOVAL, President of California State University, Fresno, in his official capacity; ELLEN N. JUNN, President of California State University, Stanislaus, in her official capacity; LYNN MAHONEY, President of San Francisco State University, in her official capacity; TOMÁS D. MORALES, President of California State University, San Bernardino, in his official capacity; ROBERT S. NELSEN, President of California State University, Sacramento, in his official capacity; ELLEN J. NEUFELDT, President of California State University, San Marcos, in her official capacity; EDUARDO M. OCHOA, President of California State University, Monterey Bay, in his official capacity; THOMAS A. PARHAM, President of California State University, Dominguez Hills, in his official capacity; STEPHEN PEREZ, President of San Jose State University, in his official capacity; JUDY K. SAKAKI, President of Sonoma State University, in her official capacity; CATHY A. SANDEEN, President of California State University, East Bay, in her official capacity; FRAMROZE VIRJEE, President of California State University, Fullerton, in his official capacity; RICHARD YAO, President of California State University, Channel

Islands, in his official capacity; LYNNETTE  
ZELEZNY, President of California State University,  
Bakersfield, in her official capacity

**FILER'S ATTESTATION**

Pursuant to Local Rule 5-1, I hereby attest that on June 3, 2022, I, Catherine Cabalo,  
attorney with Peiffer Wolf Carr Kane Conway & Wise, LLP, received the concurrence of  
Douglas Collodel in the filing of this document.

/s/ Catherine Cabalo  
Catherine Cabalo


**ORDER**

Pursuant to the stipulation of the Parties and for good cause shown, the briefing schedule  
for Defendant Trustees' Motion is modified as follows:

- Plaintiff will file her Opposition to the Motion by July 18, 2022; and
- Trustees will file their Reply in support of the Motion by August 15, 2022.

**IT IS SO ORDERED.**

Dated: 6/8/2022

  
Honorable Haywood S. Gilliam, Jr.  
U.S. District Court Judge